

Ms Nirmita via email dated 6 oct 2017

Comment	Response
Section 11.4.16 and 11.4.23 are overlapping.	Removed 11.4.3
Compliance matrix is a good idea, but WCAG vs GIGW does not indicate which GIGW is against which WCAG. The table for WCAG and GIGW is also not properly formed.	Reference numbers added against each in the comparison table
In section 11.3 the phrase Mobile Accessibility Practices is still there; it should be changed to Mobile Accessibility Guidelines.	Changed practices to guidelines
In Mobile App Compliance Matrix, some references are incorrectly written as 11.5 instead of 11.4.	References corrected
Mobile App Compliance Matrix item 21 and 22 have same reference i.e. 11.4.20	Corrected
In various subsections under section 11, the guidelines say play store but play store is Android concept . We could add app store along with play store.	References to stores have been replaced by platforms
Unicode- should be 'must', mandatory, not > 'should'	Made mandatory
Intranet websites accessibility- again should be mandatory, as per the RPWD Act, it cannot be a matter of choice for employers to make their facilities and services accessible. Hence making this change will increase compliance with the Act.	GIGW applies to all government websites. Reference to compliance of intranet applications being voluntary has been removed.
Document accessibility- Section is missing- documents are integral items of a web sites and huge sources of information and communication, hence this section is critical and cannot go unaddressed. This is even mentioned in the RPWD rules, hence suggestion is to include this.	Guidelines mandate that <ol style="list-style-type: none"> 1. documents must be provided in HTML or accessible formats 2. Scanned images of text must not be used

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	Techniques for making documents in formats like MS word or Acrobat have been provided in detail in the respective websites of format owners. The reference to these techniques will be provided through the guidelines website
In section 1.8 it is mentioned that all the mobile accessibility practices are directly derived from W3c. There are a few which are not directly found in W3C guidelines, so this may be modified to 'most' of the mobile accessibility practices are based on W3c guidelines.	Modified
There is no plan for implementing these guidelines. This was the problem with the last version as well. Strongly recommended to have a plan of action- time line for implementation broken up by numbers/ ministries, addressing capacity building, submission of annual voluntary accessibility templates, mandatory certification from STQC, and/other measures for implementation. The deadline for compliance with the RPWD Act for all service providers is 2 years from the date of notification of the rules, which was done end of April, which means already 5 out of 24 months are over. NIC will be well within its mandate to set specific targets for achieving 100% compliance of all government web sites with prioritisation options if that is felt necessary. For instance, at least all the mandatory guidelines have to be complied with within the next year, perhaps one more year to comply with the advisory guidelines. Again targets/ milestones could also be like this- hypothetically, if one state government has 250 web sites, then the goal could be 85 web sites each year to be achieved in 2-3 years, with key websites being taken up first. This was just an example, please think what would make sense. Many countries who have been successful have set targets, and we certainly need this.	Not in the purview of GIGW can be taken separately
Another aspect which should be addressed is capacity building- what is the plan to ensure that all NIC scientists in the next 2 years are trained to implement the guidelines and have knowledge about it? That is not here in this document at the moment.	Not in the purview of GIGW can be taken separately
NIC may consider setting up a focal point/ committee within NIC to monitor and support implementation of the guidelines, especially on training in aspects such as accessibility for which there is little capacity.	Not in the purview of GIGW can be taken separately

Ms nirmita via e mail dated 9 /9/ 2017

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Comment	Response
<ol style="list-style-type: none"> 1. Avoid adopting WCAG POUR structure. If it is used use it wisely. 2. Certain checkpoints do not have appropriate headings. E.g. D, E, G, H must be under perceivable but currently are under Operable. Similarly, I must be under Understandable but currently under Operable. 3. Some checkpoints are difficult to understand. E.g. Grouping operable elements that perform the same action. 4. Provide WCAG 2.0 reference with techniques and tools to test wherever appropriate 5. If any of the checkpoints are differentiated as Mandatory, advisory and voluntary specifically mention them against each checkpoint. <p>Section specific comments</p> <ol style="list-style-type: none"> 1. In section 1.A, The requirement that since screen size is small we should only use native applications does not make sense. 2. Section 2.d, 2.e, 2.g and 2.i should go in first section i.e. perceivable 3. Section 2.F suggests that buttons should be placed where they are easy to access. But there is no criteria to decide what is easy to access? For example, in iOS, back button is at top left and often important buttons such as end call, ok etc. are placed at the bottom of the screen. Similarly, there are conventions for Android. Please check Android conventions and refer to the same in this document. We could require that app developers should follow conventions for the platform that they are building for 4. Section 3.a would go in part 2 i.e. operability 5. Section 4.a and 4.b would go in operability. 6. Section 4d onwards do not belong in robust, they should be in additional section 7. Include Mobile Practice 10 from Mobile practices v1.0 that deals with custom actions. Custom actions behave like context menus and help screen reader users. 8. We also recommend that Mobile Practice 2,3,4 and 5 from Mobile practices v1.0 could be included under principle 4 i.e. robust. 	<p style="color: red;">The mobile guidelines section has been rewritten to include the given suggestions</p>

Ms Nirmita via e mail dated 6/9/2017 - suggestions from experts

Comments	Remarks
<p>Title</p> <p>We recommend that the guidelines be renamed to be more generic, since they will cover areas beyond just web site accessibility. This will also leave scope for NIC to enhance and update the guidelines as and when required. Hence renaming the guidelines is important. Suggested title could be along the lines of ‘Guidelines for information and communication’.</p>	<p>Suggestions from committee members awaited</p>
<p>Revision history –</p> <p>We recommend the revision history and version of the document being included after the title page. While the original version was notified in 2009, it is also important to include the date of notification of the revised version here. It is also strongly recommended that the title of the document be changed altogether since its scope is beyond just web sites now.</p>	<p>Done</p>
<p>Message from Minister of State (Prithviraj Chavan):</p> <ol style="list-style-type: none"> In the pdf file, there is some text on the top of the page which is being read out as garbled text by the screen reader – this may be an issue with the accessibility of the document and needs to be fixed. The message also appears to give the impression that the GIGW have just been formulated, this needs to be rephrased to convey the message that The GIGW was first notified in 2009 and in order to keep abreast of developing technologies and standards and better implement and advise government (and wherever applicable private) creation, presentation and dissemination of information and services in a manner which is citizen centric and user friendly, these guidelines are being revised. The intention is to achieve increased efficiency and interoperability of information and services delivery and bring India on par with international standards. This revised version of the guidelines will also facilitate implementation of digital accessibility as mandated by the Rights of Persons with Disabilities Act 2016 and create inclusive world class smart cities. 	<p>Messages will be re written</p>

<p>Message from Secretaries:</p> <p>We recommend rephrasing sentences like ‘The World Wide Web is poised to be the most widely used medium for implementation of e governance initiatives.’ This does not make sense today, as W3 is no longer ‘poised’, it is already the most widely used medium. Similarly any references to the context in 2009 need to be updated to be relevant in 2017.</p> <ul style="list-style-type: none"> • We recommend rephrasing sentences like ‘The World Wide Web is poised to be the most widely used medium for implementation of e governance initiatives.’ This does not make sense today, as W3 is no longer ‘poised’, it is already the most widely used medium. Similarly any references to the context in 2009 need to be updated to be relevant in 2017. • In the second message also (Page 9), the text seems to indicate that this is the first version of the guidelines. This message also sounds like the introduction of 2009 GIGW and does not reflect the difference in trends, technology use and strategy that have taken place since then. It is imperative that this be recorded- there are approx. 750 government apps, smart cities, digital India and accessible India strategies, M banking, mobile governance etc. and that these guidelines impact the use of all these and ensure that technologies are interoperable, robust, accessible and compliant with international standards is important to mention. • Again, sentences like ‘ There has been a long felt need for comprehensive guidelines for development and management of Government Websites given that the government departments are increasingly using websites as a tool for interface with the citizens. The guidelines presented in this document are an effort towards this direction.’, seem to negate the existence of GIGW for the past 7 years. On the contrary, it would be better to mention that the GIGW are being ramped up and updated in response to emerging needs and with a stronger focus on implementation with the various government and private actors, since a lot of the private sector, academia etc. look towards Government standards to guide their work. 	<p>Messages will be re written</p>
<p>Terminology</p> <p>Please change all references to ‘differently abled’, or ‘physically disabled’ etc. to ‘persons with disabilities’. That is the accepted national and international nomenclature.</p>	<p>Done</p>

<p>International Standards Compliance</p> <p>It is strongly recommended that the compliance level should be WCAG 2.0 Level AA, which is clearly stated throughout the Guidelines as such. Otherwise, there are no updates since 2009 and given many technological developments and trends have taken place since then. Even the draft of WCAG 2.1 is ready and will be adopted by the end of 2018 which will render WCAG 2.0 a more dated guideline. We cannot anymore afford to go backward. In case the contention is that people have found these standards difficult to implement and have not done so yet, it is all the more important to ensure that all future implementations use the most up to date and widely accepted standard.</p>	<p>Compliance level is AA</p>
<p>Focus on Accessibility</p> <p>It is strongly recommended that a separate chapter on Accessibility be included as part of the Guidelines. At the moment the accessibility guidelines are scattered all over the place, often not even clearly referencing WCAG 2.0 properly. For example section 1.3 mentions WCAG but not 2.0. Following are specific suggestions to deal with this and make accessibility guidelines easier for developers to follow:</p> <ol style="list-style-type: none"> 1. Create a separate chapter on Accessibility which clearly lists out all the WCAG 2.0 success criteria at level AA. 2. Each guideline should clearly reference the WCAG 2.0 guideline that it references. This is critical for standardisation. It is also very important for implementation, because WCAG provides well documented explanations, success criteria, techniques and has great support for implementation. It is comprehensive and will aid state NICs implement this easily. Without this, either NIC will need to come up with a guide for implementing, which is an unnecessary effort or there will be little clarity on implementation as has been the case so far. 3. the accessibility guidelines in the other chapters must cross reference the corresponding guideline in the Accessibility chapter 4. The Accessibility chapter can also have a more comprehensive guideline on document accessibility based on the note submitted to this committee. Regarding various sections in section 4 such as notifications, forums, documents, etc., it should be clearly mentioned that the respective document should follow accessibility requirement for that format. 5. The compliance metrics at the end of the GIGW document should include the success criteria from WCAG 2.0 level AA 	<p>Point - 1 Section 1.8 dealing with accessibility and international guidelines / legislations has been included</p> <p>Point - 2 Referce to WCAG 2.0 guidelines Provided as Annexure</p> <p>Point - 3 Cross referencing given wherever required</p> <p>Point - 5 Compliance matrix includes all the guidelines from level AA of WCAG 2.0</p>

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<p>Language</p> <p>At various places in the document simple language is specified. There is no way to test “Simple language” so appropriate reading level should be specified along with tools to evaluate the reading level.</p>	<p>Reference removed</p>
<p>Mandatory / Advisory / Voluntary</p> <p>In the initial stage of the document a specific mention on Mandatory, advisory and voluntary is provided but in the guidelines no mention has been provided to notify which of the guidelines are mandatory, which are advisory and which are voluntary.</p>	<ol style="list-style-type: none"> 1. Guidelines preceding with a 'MUST' in the document are mandatory 2. Should is advisory 3. May is voluntary
<p>Compliance</p> <p>Each Ministry/ department/ agency should identify/appoint a compliance officer who is responsible for compliance with the guidelines. There also needs to be some indication of the consequences of non-compliance, especially in the case of mandatory guidelines. It is also suggested that implementing agencies be encouraged to annually upload/ submit to NIC a voluntary compliance form, similar to the VPAT under sec.508 in USA. This will help to implement and monitor compliance. One of the major failures of the previous version of GIGW is that it was barely implemented by a few ministries, hence we must learn from the previous endeavour and try to put in more thought into how this can be implemented.</p>	<ol style="list-style-type: none"> 1. Web Information Manager has been made responsible to ensure compliance 2. NIC is not the compliance monitoring body
<p>Miscellaneous</p> <ul style="list-style-type: none"> ● Providing a paragraph that says the techniques to make website accessible are available on W3C WAI website at https://www.w3.org/TR/WCAG-TECHS/ ● It would be useful to mention about the availability of WAI ARIA 1.0 technology. Interested and enthusiastic developers use ARIA roles, states and properties to make the content more accessible. ● No mention has been made about rich components such as Accordions, rich text editors, modals, tabs etc and how to make them accessible. 	<p>Point - 1 Reference to WCAG guidelines and WCAG given in sections 1.8 and 7.5</p> <p>Point – 2, 3 May be discussed in the guidelines website</p>
<p>Section-wise Guidelines Comments</p>	

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<p>Sec 1.2 Scope and objective- may also state that the chapter on Accessibility has been included in compliance with section 40 of the Rights of Persons with Disabilities Act 2016 and will hence be mandatory.</p>	<p>Section 1.8 dealing with accessibility and international guidelines / legislations etc has been included</p>
<p>Sec 1.5 Reference under 1.5 should be to the Rights of Persons with Disabilities Act 2016 and India's commitments under the UNCRPD. Overall recommendation to ensure that references are properly done – they need to be very specific and provide all required details.</p>	<p>Section 1.8 dealing with accessibility and international guidelines / legislations etc has been included</p>
<p>Sec 1.6 Intranet web sites accessibility under 1.6 – We recommend that this be made mandatory since many government employees are persons with disabilities. Accessible workplace and environment are now mandatory under the RPWD Act and inaccessible intranets would be in contravention of this act.</p>	<p>GIGW applies to all government websites. Reference to compliance of intranet applications being voluntary has been removed.</p>
<p>Sec 2.1.1 Following requirement should be added: The National Emblem or State emblem or logo for public sector organizations should have proper Alternative text so that persons experiencing vision difficulties would be able to identify the veracity of the website.</p>	<p>Done</p>
<p>Sec 3.2.5 Where links target to external non-governmental websites, the following statement is suggested (to be reworded as appropriate to clarify the message): "This link shall take you to a page outside the (website URL). For any query regarding the contents of the linked page, please contact the webmaster of the concerned website." One suggestion is to mention the above statement in one single location such as disclaimer and notify each link with a simple icon or indication that the link targets to non-government website.</p>	<p>The sample is already present</p>
<p>Sec 3.2.7 Suggestion to include accessibility as one of the considerations while linking to third party web sites. For example, while linking with any payment portal, make sure that the payment portal is also accessible for persons with disabilities. It is recommended that a service should be evaluated end to end to ensure that a person with disability can complete the transaction regardless of who owns or manages the part of the service.</p>	<p>Third party websites not in the scope of the document , departments have to take a decision on this</p>
<p>Sec 4 We recommend that all content should be required to be in 'Unicode'. In case of tenders, the Guidelines may also recommend that all tender documents may also contain a clause to ensure that</p>	<p>Unicode has been made mandatory</p>

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<p>the product/ services which are the subject matter of the tender should conform to the accessibility guidelines contained in here.</p>	
<p>Sec 4.2.5 The format of the Application or form must be specified along with the link text E.g. Form 16 English PDF. Same applies to all places where downloadable/ viewable documents are present. This is specifically mentioned in 4.4.7 but having the format importance in each applicable section may help the readers of this document.</p>	<p>Reference to section 7.4.2 which deals with file formats has been given in forms , documents and circulars</p>
<p>Sec 4.2.7 The points G and H in section 4.2.7 are same.</p>	<p>Removed pt H</p>
<p>Sec 4.3.3 The section pertaining to usage policy should be modified to include disability</p>	<p>Section on Discussion forums has been revised. it is proposed to carry out all discussions on My Gov</p>
<p>Sec 4.4.6 For section 4.4.6 on Help, it is recommended that instead of suggesting a separate section, the websites should be required to provide help option next to the place where help is needed. This is more effective as users would be able to find help immediately. The websites should also be required to update help along with the content. In case this is for some reason not possible, then it should be a page that has link from each prominent page of the website. Having this link as part of secondary navigation or footer navigation may be helpful. Further this link must be consistently displayed at the same location and section on all the available pages of the website.</p>	<p>Guideline pertaining to help has been rephrased and " having a help link on a consistent location in every page across the website" has been included</p>
<p>Sec 5.3 Provide sample or recommended tools for evaluating 5.3.5, Readability, 5.3.6 spelling and grammar and 5.3.8 language of the page. Section 5.3.8 talks about defining default language of the page and section containing different language than the primary language. No intimation is provided for the content authors to understand where to provide the lang attribute and how to find the language specific codes as the values. In addition no mention of tools to check if the language attribute is provided or if provided if the value is accurate. In section 5.3.1, there is a typo instead of clear it reads lear. In 5.5.6, It is mentioned that Icons may be accompanied with text. Infact it should say, icons that represent meaningful information to the users must be accompanied with text. For example: An icon in an image format must have alternate text available to aid screen reader users.</p>	<p><u>Paragraph-1</u> Techniques will be given in the guidelines website <u>Paragraph-2</u> Techniques will be given in the guidelines website <u>Paragraph-3</u> Done <u>Paragraph-4</u> Rephrased with reference to section 6.6.3 on alt text</p>

<p>Sec 5.6</p> <ul style="list-style-type: none"> In section 5.6.1, we recommend adding the requirement that heading and labels should be properly tagged as per html standard. If look and feel needs to be modified, css could be used. This recommendation could be determined from section 5.6.3, but it would take an accessibility expert to understand that. 5.6.1 and 5.6.3 talk about form labels but no where the term labels is accompanied with the terms like form elements, input fields etc. Possibility of misunderstanding the meaning of labels and headings is high. Section 5.6.3 talks about headings, lists, form label positioning etc. No statement in the guideline talks about how to do or a sample mechanism to do it. Furthermore, it is mentioned that the headings must be bigger in font and in bold. This mechanism cannot make accessible headings. The guidelines must clearly mention the need for the use of HTML headings with proper hierarchy without which headings will not be accessible for screen reader users. Similarly, specific mention of the use of ordered/ unordered/ definition list and labels for form association must be clearly emphasised. <p>Section 5.6.3 may also deal with the data tables, their usage and how to make them accessible.</p>	<p>Techniques will be given in the guidelines website</p>
<p>Sec 5.7</p> <p>We recommend specifically mentioning that content should be in Unicode.</p>	<p>Unicode has been made mandatory</p>
<p>Sec 6.2.1</p> <p>In section 6.2.1, add the recommendation that various sections of the page should be identified with landmarks for html4.1 or semantic tags for html5. For example, main body of the page must be identified by role="main" for html4.1 or <main> for html5. Similarly, navigation section should be marked with either aria role="navigation" for html4.1 or <nav> tag html5. Main body should also be identified with a heading. This information could also be added in section 7.5.</p>	<p>Techniques will be given in the guidelines website</p>
<p>Sec 6.5.1</p> <p>In Section 6.5.1 the topic of minimum color contrast is discussed. The guideline says the text that is substantially large is an exception. It is also worth mentioning what parameters define that the text is substantially large. In addition, as per WCAG 2.0, 1.4.3 minimum contrast success criterion, large text must have a minimum contrast ratio of 3:1 with its background. In GIGW this is not called out. Recommendation is to adhere to WCAG specifications as standard international parameters and not to create new ones.</p>	<p>Done</p>

<p>Sec 6.6 Section 6.6 talks about Images and alternate text. Unclear about what this sentence means in the guideline. “The use of text, rather than images, should be considered for headings and website navigation.”. In section 6.6, it is mentioned that longdesc attribute can be used to provide summary of complex images such as charts and tables. Suggestion that tables do not need longdesc. HTML5, does not support longdesc.</p>	<p><u>Paragraph-1</u> Guideline Rephrased <u>Paragraph-2</u> Guideline Removed</p>
<p>Sec 6.7 Section 6.7 has the following sentence. “the webpage MUST provide a means to control the volume & audio playing in the page independently from the overall system volume level.” Please check whether this should be Volume of audio, not volume and audio.</p>	<p>Corrected</p>
<p>Sec 6.8.6 List of all levels between the homepage and current page should be provided on each page. Does this mean the use of breadcrumb?</p>	<p>Breadcrumbs explicitly mentioned</p>
<p>Sec 6.9 It should be added that search section must be marked with html heading so that screen reader users can quickly locate search results. Additionally search option may be marked with aria role=”search” so that screen reader user can locate search box quickly.</p>	<p>1. Advisory wrt Headings included 2. ARIA role is advisory and will be discussed in the guidelines website</p>
<p>Sec 6.11 talks about the Use of frames. No specific mention of making them accessible. i.e. having a unique title for each frame to identify the content of the frame is mentioned.</p>	<p>Section modified. As frames are no longer supported in HTML5 this has been made advisory. More details will be available on guidelines website</p>
<p>Sec 7.2 In section 7.2, it should be mentioned that css positioning does not affect screen reader rendering so text positioning in the html source is important so it should be checked to understand that the order in the source makes sense.</p>	<p>Reference to the same is given in section 7.2.2</p>
<p>Sec 7.4 For accessibility of documents, please add the following: Often various documents are provided in PDF format and screen reader users find them inaccessible. To solve that problem, try to provide such documents in html format along with pdf file. While creating the PDF document, ensure the following points: 1. All document elements such as headings, graphics and tables should be properly marked.</p>	<p>Guidelines mandate that</p> <ul style="list-style-type: none"> • Documents must be provided in HTML or accessible formats • Scanned images of text must not be used. In case of signed document the accessible format must be included

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<p>2. Tables accessibility is very important as incorrectly marked tabular data is almost useless for a screen reader user.</p> <p>3. Never use image of text in place of text in PDF files. For example, often people scan a document and create a PDF of that image. Such PDFs are not accessible for screen reader users.</p> <p>4. PDF should be tagged: Various software provide options to tag PDF automatically. For example, In Microsoft Word 2010 and above while saving a document as PDF there is a setting in Options for selecting tags. Tag is a default option so you could verify if that is true.</p> <p>5. In order to generated well-tagged PDF file, original document should also be properly well formatted.</p> <p>In case of linking with any payment portal, make sure that the payment portal is also accessible for persons experiencing disabilities.</p>	<p>Techniques for making documents in formats like MS word or Acrobat have been provided in detail in the respective websites of format owners. The reference to these techniques will be provided through the guidelines website</p>
<p>Sec 7.6 In the testing and quality section no tools are mentioned that help the developers or quality assurance engineers can use to check for accessibility, color contrast or markup.</p>	<p>This will be dealt through the guidelines website to keep the information up to date</p>
<p>Sec 8.1.3 Universal accessibility - may consider expanding the scope to referring to service, product or environment, including web sites and mobile software, applications and services.</p>	<p>Not in the scope of the document</p>

Mr Srikant via email dated 10 oct 2017

Suggestion	Response
<p>We should keep the WCAG version open ended if possible - 2.0 is mentioned in many places. But Version 2.1 is on the verge of ratification which adds 21 new success criteria to the existing 2.0 list. We should look at covering those too in this document.</p>	<p>Can not be included unless they are a part of the standard. The document will be upgraded once WCAG 2.1 comes into effect</p>
<p>As per the document 'The Accessibility Audit' is a onetime process which is done prior to launch. However, changes and/or updates to the site often break some of these functionality. Can we introduce a periodic review or audit based on the amount of changes on the site?</p>	<p>STQC does an yearly review of the certified sites and the certificate is valid for 3 years</p>
<p>In my opinion the load of periodic testing might be too high for STQC to handle, hence I suggest that there should empanelment of other private providers to do these certifications as per the Gol guidelines.</p>	<p>Will be taken up separately. Not a part of the document</p>
<p>Mobile apps should be re-tested prior to each new version being posted on play store.</p>	<p>New version will be treated as a new app</p>
<p>In my opinion this document has been written keeping in mind the visually impaired people other disabilities should have been considered.</p>	<p>WCAG 2.0 considers all disabilities that hinder access to the web. GIGW complies with WCAG 2.0</p>
<p>I would also like to suggest that this document was based on the pre- RPwd Act era i.e. 7 disabilities only. While the RPwD Act now talks of 21 disabilities, hence some research/findings should be done to ascertain as to what changes/modifications would be required to make the sites and apps accessible for the other 14 new disabilities also.</p>	<p>Many of the disabilities in the list do not pose any barrier in accessing the web</p>
<p>Overall - definitions should match the definitions from WCAG specifications.</p>	<p>Checked with WCAG website</p>
<p>Perceivable definition – I think it should be “it can’t be invisible to any of their senses.”</p>	<p>Checked with W3C website</p>

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<p>Operable definition needs to be rephrased. I couldn't understand the wording "interface cannot require interaction that a user cannot perform"</p>	<p>Checked with W3C website</p>
<p>Ensuring that the sites are accessible with equal ease to all users on all the major browsers and across all platforms and bandwidths ie universally accessible It might not be feasible to make everything accessible across all IT and browser combinations. It would be good to define some minimum acceptance criteria instead of generalizing and asking for everything.</p>	<p>Rephrased as "ensuring that the sites are accessible with equal ease to all users using current version of major browsers and across all major platforms."</p>
<p>6.7.2 In order to ensure that content of video and audio clips is accessible to all, including those with impaired vision or those accessing the information on slow connections --- Transcript is also required for hearing impaired people also.</p>	<ol style="list-style-type: none"> 1. For audio only clips equivalent information in form of transcript is required 2. For audio synchronised with other media(like video) captioning is required
<p>6.7.2 b It has to be re-phrased. Audio content will have transcripts and Video content will have captions - this is for deaf or hearing impaired.</p>	<ol style="list-style-type: none"> 1. 6.7.2(a) deals with transcripts 2. Video content needs captioning only if it is accompanied with audio otherwise transcript can be given
<p>Audio description is required for blind users</p>	<p>6.7.2 deals with audio description for video</p>
<p>Grammatically incorrect statements</p> <ul style="list-style-type: none"> ● Page 21- Under these four principles are 12 guidelines ● Page 21 - With regard to accessibility focus of GIGW is on: 	<p>Modified</p>
<p>7.5 a elements do not contain duplicate attributes, and any IDs are unique</p>	<p>Rephrased as "ID's if any are unique"</p>
<p>There are some punctuation and grammatical mistakes in the document</p>	<p>Corrected</p>

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Page 22 Chapter numbers are mentioned wrongly. [Should be 'Chapter 5' instead of 'Chapter 4'; 'Chapter 5' should be 'Chapter 6' and 'Chapter 6' should have been 'Chapter 7' instead].	Corrected
There is no section 5.3.8	Reference removed

NIC Members

Page 108 Section 11.4.1 the text "app designers should also follow platform specific design guidelines." may require to be formatted.	Corrected
Section 11.4.2 the start of the para "each UI" be corrected as Each UI	Corrected
Page 113 Section 14.4.19 & 14.4.20 the caption/subtitle/transcript and audio play should support local language preference of the user.	Captioning will be in the language of the audio
Page 114 Section 11.4.23 may be combined with Page 112 section 11.4.16 or introduced immediately after 11.4.16 so that all keyboard related information is grouped together.	Section 11.4.23 merged with 11.4.16

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<p>Page 114 Section 11.4.24 Data Capture for key elements The data capture for key elements of the App such as Aadhar, Voter-ID, PAN, Vehicle numbers, employee-id, beneficiary-id etc. may be read as QR CODE (2D Barcode) in order to eliminate typo errors and to provide service instantly. Care should be taken to implement the guidelines from UIADI whenever Aadhar number and e-KYC details are used</p>	<p style="color: red;">Section Added</p>
<p>Section 11.5.1 A bullet item for using caching for data may be incorporated. Apps can use local cache for frequently used meta information pertaining to the application; however sensitive information should not be cached.</p>	<p style="color: red;">Catching not preferred due to security reasons</p>
<p>Page 115 Section 11.15 the URL references can be shifted to the end of the document in a separate Chapter.</p>	<p style="color: red;">Not reader friendly</p>
<p>Page 118 Section 11.8.1</p> <ul style="list-style-type: none"> ● under para "user provided information" it is mentioned "Credit Card Information for use of the service". Please check whether it needs to be retained as NIC do not collect such information of sensitive nature. ● under para "changes" provide placeholder for the URL of the "Privacy Policy" 	<ul style="list-style-type: none"> ● Modified ● Placeholder provided
<p>Page 131 The compliance table item 14 is empty.</p>	<p style="color: red;">Placed content at item no 14</p>
<p>Copyright message @2015 many have to be set to @2017</p>	<p style="color: red;">Corrected</p>
<p>A section on Authentication may be introduced.</p>	<p style="color: red;">Part of security guidelines (as defined by OSWAP)</p>
<p>App expiry to be explicitly defined for each App and implemented</p>	<p style="color: red;">Section Added</p>

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Alerts through social media facebook, gmail, whatsapp, telegram, etc. management in the app can be defined	Desired feature not mandatory
Standards for image(photo) management to be included	Not required as a guideline

From Mr shrikant via e mail dated 11th october 2017 - suggestions from Mr Ashutosh from Microsoft

Clause	Alignment with WCAG 2.0	Note	Response
6.1.1	Not in WCAG 2.0	We have no objection to it being applied to government sites, but note that it will be debatable as to how prominent does the government ownership be. We recommend that they explicitly state that this is not a WCAG 2.0 success criterion.	<ul style="list-style-type: none"> ● GIGW deals with entire lifecycle of website and accessibility is one of the features ● This guideline must be understood in conjunction with 2.1.1 and 6.3.1
6.2.1	Not in WCAG 2.0	We have no objection to it being applied to government sites, but there will likely be cases where this can be difficult to achieve. We recommend that they explicitly state that this is not a WCAG 2.0 success criterion.	<ul style="list-style-type: none"> ● Many sites have links to pages that do not even have a global navigation link or a link back to the home page ● Deals with placement of navigation elements ● This is to encourage using good design practices. ● Must be understood in conjunction with 6.8.1 and 6.8.2
6.4.3	Not in WCAG 2.0	We have no objection to it being applied to government sites. We recommend that they explicitly states that this is not a WCAG 2.0 success criterion.	GIGW deals with entire lifecycle of website and accessibility is one of the features therefore

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			guideline not being a part of WCAG need not be explicitly mentioned
6.4.5	Same as WCAG 2.0 1.4.4	The requirement is the same, but WCAG 2.0 contains definitions to terms and GIGW doesn't. This omission makes GIGW less clear. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
6.4.6	Not in WCAG 2.0	A well-designed page would other print while omitting the navigation bars, ads, and some other non-essential features. A good example is to look at a news sites like New York Times. When you print a news story, all the navigation bars and ad are dropped. That way you print out only essential element of the page, instead of everything. Thus this is not possibly a very substantial recommendation.	Many websites do not use css media queries to format content for print. This is aimed to encourage development of a separate print layout
6.5.1	Same as WCAG 2.0 1.4.3	The requirement is the same, but WCAG 2.0 contains definitions to terms and GIGW doesn't. This omission makes GIGW less clear. In this particular case, WCAG 2.0 defines how big text needs to be to use 3:1 contrast and GIGW does not. This omission makes GIGW 6.5.1 not objectively testable. We recommend that we explicitly identify the associated WCAG 2.0 success criterion.	<ol style="list-style-type: none"> 1. Reference to standards for large text provided in the document (18pt or 14 pt bold) 2. Reference to the corresponding WCAG 2.0 guideline provided
6.5.4	Same as WCAG 2.0 1.4.1	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
6.6.1	Same as WCAG 2.0 1.4.5	The requirement is the same, but WCAG 2.0 contains definitions to terms and GIGW doesn't. This omission makes GIGW less clear. We recommend that we explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided

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6.6.3	Similar to WCAG 2.0 1.1.1	GIGW gets too specific here by using the ALT attribute as the only way to provide text alternative to non-text content. ALT attribute is the most obvious way to meet when using HTML. But that is clearly not the only way. If they consult WCAG 2.0 techniques, they will see other options for other technologies. We recommend that they explicitly identify the associated WCAG 2.0 success criterion and use identical text.	Reference to the corresponding WCAG 2.0 guideline provided
6.7.1	Not in WCAG 2.0	We have no objection to it being applied to government sites, but this does not seem too relevant today. We recommend that they explicitly state that this is not a WCAG 2.0 success criterion.	<ul style="list-style-type: none"> ● GIGW deals with entire lifecycle of website and accessibility is one of the features ● Aimed at improving the usability of website
6.7.2	Similar to WCAG 2.0 1.2.1, 1.2.2, and 1.2.4	The requirement is largely the same, but WCAG 2.0 contains definitions to terms and GIGW doesn't. This omission makes GIGW less clear. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
6.7.3 a	Similar to WCAG 2.0 2.3.1	Not everything that flashes more than three times in a sec triggers seizure. WCAG 2.0 contains extensive explanation of general flash and red flash threshold, but GIGW omits it completely. This is a significant omission. We recommend that they explicitly identify the associated WCAG 2.0 success criterion and use identical text.	<ol style="list-style-type: none"> 1. Guideline corresponds to WCAG 2.0 2.3.2(AAA) that does not allow any flashing more that 3 times a second as testing for AA (2.3.1) will be difficult 2. Reference to the corresponding WCAG 2.0 guideline provided
6.7.3 b	Similar to WCAG 2.0 2.2.2	The requirement is largely the same, but WCAG 2.0 contains definitions to terms and GIGW doesn't. This omission makes GIGW less clear. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided

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6.8.1	Not in WCAG 2.0	We have no objection to it being applied to government sites. We recommend that they explicitly states that this is not a WCAG 2.0 success criterion.	GIGW deals with entire lifecycle of website and accessibility is one of the features therefore guideline not being a part of WCAG need not be explicitly mentioned
6.8.2	Same as WCAG 2.0 3.2.3	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
6.8.4	Not in WCAG 2.0	Testing this requirement would be tough. We recommend it to be removed.	<ul style="list-style-type: none"> ● Will Require manual testing ● Required to discourage the practice of developing web pages for which the content is expected in the future
6.8.5	Not in WCAG 2.0	This requirement seems to contradict other previous requirements. This may make websites rather difficult to maintain overtime. We recommend that we explicitly state that this is not a WCAG 2.0 success criterion.	<ol style="list-style-type: none"> 1. Useful if the visitor reaches the poae through search engine. Can be a usability feature 2. Can be Easily implemented if page templates are used.
6.8.8	Same as WCAG 2.0 2.4.1	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
6.9.1	Similar to WCAG 2.0 2.4.5	Requiring search functionality in all webpages seems a little too prescriptive and may not be suitable for smaller and some specialized websites.	<ul style="list-style-type: none"> ● Not technically difficult to implement ● Requires presence of search functionality or a link to search page
6.10.1	Similar to WCAG 2.0 2.4.5	This is very prescriptive and may not be suitable in many sites.	<ul style="list-style-type: none"> ● Not technically difficult to implement ● Also solves usability issues

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6.11	This is an HTML technique used to meet several WCAG 2.0 success criteria	To start, frame is hardly used these days for websites. More importantly, this is a very specific technique that is never intended as a requirement. We recommend it to be replaced with appropriate WCAG 2.0 success criteria.	Changed to advisory
7.2.1	Not in WCAG 2.0	Don't know how anybody knows if this requirement is met or not. We recommend to replace the "MUST" to "should".	<ul style="list-style-type: none"> ● Use of CSS is advisory ● Responsive interface is a mandatory ● Will require manual testing
7.2.2	Not in WCAG 2.0	We recommend to replace the "MUST" to "should".	
7.4.2	Not in WCAG 2.0	There's no definition of what makes a document "accessible". We recommend instead to ask for documents to follow the accessibility specifications of the file instead.	<p>Guidelines mandate that</p> <ol style="list-style-type: none"> 1. documents must be provided in HTML or accessible formats 2. Scanned images of text must not be used <p>Techniques for making documents in formats like MS word or Acrobat have been provided in detail in the respective websites of format owners. The reference to these techniques will be provided through the guidelines website</p>
7.5a	Similar to WCAG 2.0 4.1.1	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5b	Same as WCAG 2.0 3.3.2	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided

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7.5c	Similar to WCAG 2.2.1	It is not great that GIGW combines two separate exception conditions (Real-time and essential) into one. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5d	Same as WCAG 2.0 1.3.3	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5e	Same as WCAG 2.0 3.3.1	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5f	Same as WCAG 2.0 2.1.1	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5g	Same as WCAG 2.0 2.1.2	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5h	Same as WCAG 2.0 2.4.4	An exception is removed from WCAG 2.0 success criterion. While the exception is not likely to apply to government sites, such change is not recommended. We recommend that we restore the exception and explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5i	Same as WCAG 2.0 3.2.1	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5j	Same as WCAG 2.0 3.2.2	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided

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7.5k	Not in WCAG 2.0	We have no objection to it being applied to government sites. We recommend that they explicitly states that this is not a WCAG 2.0 success criterion.	GIGW deals with entire lifecycle of website and accessibility is one of the features therefore guideline not being a part of WCAG need not be explicitly mentioned
7.5l	This is only a WCAG 2.0 technique	This is a bit overly prescriptive and only meant as A way to meet WCAG 2.0, not THE way to do so. We recommend the use of WCAG 2.0 as is.	Had to be specifically included as government websites provide significant amount of tabular data
7.5m	Same as WCAG 2.0 2.4.3	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5n	Same as WCAG 2.0 4.2.2	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5o	Same as WCAG 2.0 2.4.7	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5p	Same as WCAG 2.0 3.3.3	No objection to this. We recommend that they explicitly identify the associated WCAG 2.0 success criterion.	Reference to the corresponding WCAG 2.0 guideline provided
7.5q	Same as WCAG 2.0 3.3.4	No objection to this, except we are not sure why there is not a "MUST" in the text. We recommend that they explicitly identify the associated WCAG 2.	<ol style="list-style-type: none"> 1. Reference to the corresponding WCAG 2.0 guideline provided 2. MUST included in the guideline statement